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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG& E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

**MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR RELIEF FROM AUTOMATIC STAY
TO PERMIT STATE COURT JURY
TRIAL OF 2017 TUBBS WILDFIRE
CLAIMS**

Date: July 23, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16 Floor
San Francisco, CA 94102

Objection Deadline: July 18, 2019 at 4:00 p.m.

1 The Official Committee of Tort Claimants (hereafter, the “TCC”) in the above-captioned
2 chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric
3 Company (collectively, the “**Debtors**” or “**PG&E**”), hereby submits this Motion (the “**Motion**”),
4 pursuant to section 362(d)(1) of title 11 of the United States Code (the “**Bankruptcy Code**”),
5 sections 1334(c) and 1452(b) of title 28, Rules 4001 and 5011(b) of the Federal Rules of
6 Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 4004-1 of the Bankruptcy Local
7 Rules for the United States District Court for the Northern District of California (the
8 “**Bankruptcy Local Rules**”) for entry of an order terminating the automatic stay to permit the
9 individuals listed on **Exhibit A** hereto to proceed to a jury trial on their personal injury and
10 related property damage claims against the Debtors arising from the 2017 Tubbs Fire as set forth
11 in the Complaints against the Debtors (attached as **Exhibits B and C** hereto), as may be
12 amended, and to request the Court in the California North Bay Fire Cases, JCCP 4955, to order
13 the Tubbs Fire Claims to trial with preference pursuant to Code of Civil Procedure section 36.
14 Should the Debtors, in response to this Motion, request the Court to permit any additional
15 litigation to go forward in the California Superior Court, the TCC requests the Court to terminate
16 the automatic stay with respect to the additional litigation. In support of the Motion, the TCC
17 submits a Memorandum of Points and Authorities, the declaration of Steven M. Campora
18 (“**Campora Decl.**”), the declaration of Robert A. Julian (“**Julian Decl.**”), the declaration of
19 Michael A. Kelly (“**Kelly Decl.**”) and the declaration of Brent C. Williams (“**Williams Decl.**”),
20 filed contemporaneously herewith. A proposed form of order granting the relief requested herein
21 is attached hereto as **Exhibit D**.

22
23 Dated: July 2, 2019

BAKER & HOSTETLER LLP

24 By: /s/ Robert A. Julian
25 Robert A. Julian

26 *Counsel for The Official Committee of Tort*
27 *Claimants*
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